

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

GREAT AMERICAN ALLIANCE)	
INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 6:15-cv-3355
)	
GRISHAM FARM PRODUCTS, INC.,)	
)	
Defendant.)	

DEFENDANT'S STATUS UPDATE

Pursuant to this Court's Order of October 20, 2016, [Document Number 21] Defendant, Grisham Farm Products, Inc., provides the following status update with regard to filing for bankruptcy protection:

Grisham Farm Products, Inc., has retained attorney Jonathan A. Margolies with the firm of McDowell, Rice, Smith & Buchanan to file for Chapter 11 bankruptcy on its behalf. All schedules have been prepared and the filing fee has been paid to counsel. It is anticipated that the bankruptcy proceeding will be filed no later than November 1, 2016. Defendant has provided Plaintiff's counsel with the names of corporate representatives for depositions which will be taken expeditiously in the event the bankruptcy is not filed by November 1. Further, if the bankruptcy proceeding is not filed by November 1, Defendant will work with Plaintiff's counsel to promptly finish discovery and comply with the Scheduling Order. Defendant will not oppose a reasonable request by Plaintiff to extend deadlines for discovery and motions.

Respectfully submitted,

LATHROP & GAGE LLP

By: /s/ Joseph L. Johnson

Joseph L. Johnson Mo. Bar #45456

Joshua Christensen Mo. Bar #63759

910 E. St. Louis Street, Suite 100

Springfield, MO 65806-2523

Telephone: (417) 886-2000

Facsimile: (417) 886-9126

**ATTORNEY FOR DEFENDANT
GRISHAM FARM PRODUCTS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a copy of the foregoing **STATUS UPDATE** to be served upon the following counsel of record via e-mail and ECF filing on October 28, 2016:

Clark H. Cole
ccole@armstrongteasdale.com
Cynthia M. Juedemann
cjeudemann@armstrongteasdale.com
Armstrong Teasdale LLP
7700 Forsyth Blvd., Suite 1800
St. Louis, MO 63105

/s/Joseph L. Johnson

Joseph L. Johnson